



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 23, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of Union Springs Telephone Company  
Study Area Code 250322**

Dear Ms. Dortch:

On behalf of Union Springs Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Sandra Huner
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	swhuner@ustconline.net
	Form Type	54.313 and 54.422



<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
250322a1510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	250322a1610.pdf



REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

[illegible]



**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250322
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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<015>	Study Area Name	UNION SPRINGS TEL CO
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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

<b>(2005) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

### Incremental Connect America Phase I reporting

<2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	
<2024A> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	<div style="border: 1px solid black; height: 60px; width: 100%;"></div>
<2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A> Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	<div style="border: 1px solid black; height: 60px; width: 100%;"></div>
<2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input style="width: 100px; height: 20px; border: 1px solid black;" type="text"/>	

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		250322a13010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	250322a13026.pdf

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**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

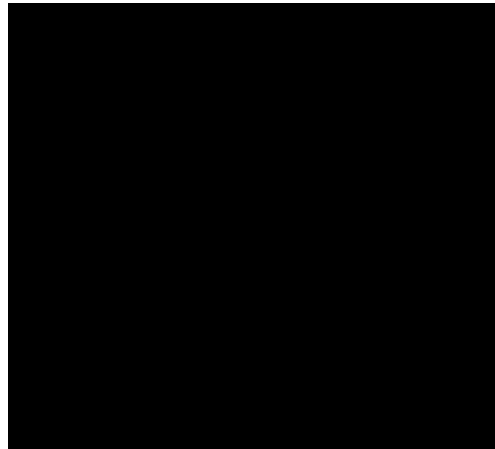
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	250322
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<039> Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	250322
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<039> Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	UNION SPRINGS TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/22/2017
Printed name of Authorized Officer:	Vicki McPherson
Title or position of Authorized Officer:	Secretary / Treasurer
Telephone number of Authorized Officer:	3347700937 ext.
Study Area Code of Reporting Carrier:	250322 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	UNION SPRINGS TEL CO
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/22/2017
Name of Authorized Agent Employee:	Wes Robinson
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	250322 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**Union Springs Telephone Company, Inc.**

**Study Area Code: 250322**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance – Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Union Springs Telephone Company, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Alabama Public Service Commission’s Rules and Regulations, Telephone Rules, Rule T-12, Filing of Telephone Tariffs and The Code of Alabama 1975 Section 37-1-81, which disclose rates, terms

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require adherence to minimum service standards as identified in the Alabama Public Service Commission's Rules and Regulations, Telephone Rules, Rule T-21, protection against cramming and other deceptive practices as identified in Rule T-16(C)(11); (3) truth-in-billing requirements as identified in Rule T-16; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

**Union Springs Telephone Company, Inc.**

**Study Area Code: 250322**

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and  
Broadband**

Union Springs Telephone Company, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the applicable Alabama Public Service Commission Rules and Regulations, Telephone Rules. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company’s central office(s) that have twenty-four (24) hour maintenance coverage or have an automatic start engine alternator can provide a minimum of three (3) hours of battery reserve in accordance with the Alabama Public Service Commission Rules and Regulations, Telephone Rules, Rule T-21(L)(2). All other central office(s), as and if applicable, have a minimum of eight (8) hours of battery reserve in accordance

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

with Rule T-21(L)(2). The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

The Company is equipped with a natural gas generator that will power all voice and broadband equipment as well as being equipped with recently-replaced battery back-ups to maintain power during a transition from commercial to back-up power and for a minimum of eight (8) hours should the fuel supply be interrupted. All remote equipment locations have batteries to maintain them for a minimum of eight (8) hours. Portable generators are also available for extended periods of commercial power interruptions.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	AL	Union Springs	39.95	0.0	39.95	6.0	1.0	999999.0	Other, Internet with Telephone
	AL	Union Springs	49.95	0.0	49.95	10.0	2.0	999999.0	Other, Internet with Telephone
	AL	Union Springs	59.95	0.0	59.95	15.0	3.0	999999.0	Other, Internet with Telephone
	AL	Union Springs	69.95	0.0	69.95	25.0	3.0	999999.0	Other, Internet with Telephone
	AL	Union Springs	59.95	0.0	59.95	6.0	1.0	999999.0	Other, Internet Only
	AL	Union Springs	69.95	0.0	69.95	10.0	2.0	999999.0	Other, Internet Only
	AL	Union Springs	79.95	0.0	79.95	15.0	3.0	999999.0	Other, Internet Only
	AL	Union Springs	89.95	0.0	89.95	25.0	3.0	999999.0	Other, Internet Only
	AL	Midway	39.95	0.0	39.95	6.0	1.0	999999.0	Other, Internet with Telephone
	AL	Midway	49.95	0.0	49.95	10.0	2.0	999999.0	Other, Internet with Telephone
	AL	Midway	59.95	0.0	59.95	15.0	3.0	999999.0	Other, Internet with Telephone
	AL	Midway	69.95	0.0	69.95	25.0	3.0	999999.0	Other, Internet with Telephone
	AL	Midway	59.95	0.0	59.95	6.0	1.0	999999.0	Other, Internet Only
	AL	Midway	69.95	0.0	69.95	10.0	2.0	999999.0	Other, Internet Only
	AL	Midway	79.95	0.0	79.95	15.0	3.0	999999.0	Other, Internet Only
	AL	Midway	89.95	0.0	89.95	25.0	3.0	999999.0	Other, Internet Only
	AL	Perote	39.95	0.0	39.95	6.0	1.0	999999.0	Other, Internet with Telephone
	AL	Perote	49.95	0.0	49.95	10.0	2.0	999999.0	Other, Internet with Telephone
	AL	Perote	59.95	0.0	59.95	15.0	3.0	999999.0	Other, Internet with Telephone
	AL	Perote	69.95	0.0	69.95	25.0	3.0	999999.0	Other, Internet with Telephone
	AL	Perote	59.95	0.0	59.95	6.0	1.0	999999.0	Other, Internet Only

REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250322
<015>	Study Area Name	UNION SPRINGS TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sandra Huner
<035>	Contact Telephone Number - Number of person identified in data line <030>	3347384400 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	swhuner@ustconline.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	AL	Perote	69.95	0.0	69.95	10.0	2.0	999999.0	Other, Internet Only
	AL	Perote	79.95	0.0	79.95	15.0	3.0	999999.0	Other, Internet Only
	AL	Perote	89.95	0.0	89.95	25.0	3.0	999999.0	Other, Internet Only
	AL	Fort Davis	39.95	0.0	39.95	6.0	1.0	999999.0	Other, Internet with Telephone
	AL	Fort Davis	49.95	0.0	49.95	10.0	2.0	999999.0	Other, Internet with Telephone
	AL	Fort Davis	59.95	0.0	59.95	15.0	3.0	999999.0	Other, Internet with Telephone
	AL	Fort Davis	69.95	0.0	69.95	25.0	3.0	999999.0	Other, Internet with Telephone
	AL	Fort Davis	59.95	0.0	59.95	6.0	1.0	999999.0	Other, Internet Only
	AL	Fort Davis	69.95	0.0	69.95	10.0	2.0	999999.0	Other, Internet Only
	AL	Fort Davis	79.95	0.0	79.95	15.0	3.0	999999.0	Other, Internet Only
	AL	Fort Davis	89.95	0.0	89.95	25.0	3.0	999999.0	Other, Internet Only

**Union Springs Telephone Company**

**Study Area Code: 250322**

**Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Union Springs Telephone Company's tariff(s) on file with the Alabama Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates are provided in Line 700 included herein this ETC Annual Report. The residential local service rates listed in Line 700 do not include all mandatory taxes, fees and surcharges, including, but not limited to, state and local taxes, 9-1-1 fees and municipal franchise fees. Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

Union Springs Telephone Company

Section 2  
5<sup>th</sup> Revised Sheet 9

## S2. BASIC LOCAL EXCHANGE SERVICE

### S2.13 LIFELINE ASSISTANCE PROGRAM

Lifeline Assistance is a government assistance program developed to reduce rates for primary residential telephone service and broadband Internet access service to qualifying subscribers who receive income-based benefits. The Company participates in this program to increase the availability of telecommunications services to all consumers in its serving areas. (N)

#### A. General

Lifeline Assistance reduces an eligible customer's monthly rates for basic voice telephone service or broadband Internet access service. An eligible customer receives a federally subsidized credit toward the monthly cost of voice telephone service or broadband Internet access service. (C, N)

1. Where available, the broadband Internet access service provides a minimum broadband speed of 10 Mbps downstream/1 Mbps upstream and a minimum usage allowance of 150 Gigabytes per month. Dial-up service does not qualify as a broadband Internet access service for purposes of Lifeline Assistance. (C, N)

#### B. Regulations

To constitute a qualifying low-income customer eligible to receive Lifeline services, a customer must meet the requirements set forth in either paragraph 1. or 2. below: (N)

1. A customer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size;
  - (a) For purposes of these rules, "income" means gross income as defined under Section 61 of the Internal Revenue Code, 26 U.S.C. § 61, for all members of the household. This means all income actually received by all members of the household from whatever source derived, unless specifically excluded by the Internal Revenue Code, Part III of Title 26, 26 U.S.C. § 101, *et seq.* (C, N)
  - (b) A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen (18) years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen (18) living with their parents or guardians are considered to be part of the same household as their parents or guardians. (C, N)

Union Springs Telephone Company

Section 2  
First Revised Sheet 9A

**S2. BASIC LOCAL EXCHANGE SERVICE**

**S2.13 LIFELINE ASSISTANCE PROGRAM**

**B. Regulations (Cont'd)**

2. Lifeline Assistance is also available to all qualifying residential customers who participate in one of the following low-income assistance programs. A subscriber will also be considered to be eligible even if he does not personally participate in any of the following programs, so long as an individual who lives in his household participates in at least one of these programs:
  - a) Medicaid
  - b) Supplemental Nutrition Assistance Program (SNAP)
  - c) Supplemental Security Income (SSI)
  - d) Federal Public Housing Assistance
  - e) Veterans and Survivors Pension Benefit
3. In addition to meeting the qualifications provided in paragraph 1. or 2. of this section, in order to constitute a qualifying low-income customer, a customer must not already be receiving a Lifeline service, and there must not be anyone else in the subscriber's household subscribed to a Lifeline service.
4. Qualifying subscribers must provide the Company with acceptable documentation as proof of their eligibility to receive Lifeline service under the income-based or program-based requirements; the documentation must be securely retained by the Company. If the Company has a reasonable basis to believe that the subscriber no longer meets the qualifying criteria for Lifeline service, the Company must notify the subscriber of impending termination of the subscriber's Lifeline service in writing separate from the subscriber's monthly bill. If the subscriber fails to provide proof of eligibility within thirty (30) days following the Company's written request to the subscriber to recertify eligibility, the credit will be discontinued on the bill and the subscriber will be de-enrolled from the Lifeline program within five (5) business days after the expiration of the subscriber's time to respond to the request.
5. If the Company receives notification from the program administrator that the subscriber is receiving Lifeline service from another eligible telecommunications carrier or that more than one member of a subscriber's household is receiving Lifeline service, the subscriber will be de-enrolled from Lifeline Assistance without notice within five (5) business days following the Company's receipt of the program administrator's notification.

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.

Union Springs Telephone Company

Section 2  
6<sup>th</sup> Revised Sheet 10

**S2. BASIC LOCAL EXCHANGE SERVICE**

**S2.13 LIFELINE ASSISTANCE PROGRAM (Continued)**

**B. Regulations (Continued)**

6. The Company will confirm a subscriber's continued eligibility to receive Lifeline service on an annual basis by requiring the subscriber to sign a certification as to his/her present qualifications for Lifeline service. The Company must notify the subscriber in writing separate from the subscriber's monthly bill that failure to respond to the recertification request will trigger de-enrollment. If the subscriber fails to provide proof of eligibility within sixty (60) days following the company's written request to the subscriber to recertify eligibility, the credit will be discontinued on the bill and the subscriber will be de-enrolled from the Lifeline program within five (5) business days after the expiration of the subscriber's time to respond to the recertification efforts.
7. A subscriber who requests de-enrollment must be de-enrolled by the Company within two (2) business days after the request.
8. The Company will not provide Lifeline benefits to subscribers who:
  - a. have used the Lifeline benefit to enroll in a qualifying Lifeline-supported broadband Internet access service offering with another Lifeline provider within the previous twelve (12) months; or
  - b. have used the Lifeline benefit to enroll in a qualifying Lifeline-supported voice telephone service offering with another Lifeline provider within the previous sixty (60) days.
9. A subscriber may receive Lifeline benefits prior to completion of the twelve (12)-month period or the sixty (60)-month period only if:
  - a. the subscriber moves his residential address;
  - b. the subscriber's current provider ceases operations or otherwise fails to provide service;
  - c. the provider has imposed late fees for non-payment greater than or equal to the monthly end user charge for the supported service; or
  - d. the subscriber's current provider is found to be in violation of the FCC's rules during the twelve (12)-month period, and the subscriber is impacted by the violation.

(N)

(N)

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.

Union Springs Telephone Company

Section 2  
1<sup>st</sup> Revised Sheet 10A

**S2. BASIC LOCAL EXCHANGE SERVICE**

**S2.13 LIFELINE ASSISTANCE PROGRAM (Continued)**

**B. Regulations (Continued)**

**9. (Continued)**

If the subscriber transfers his Lifeline benefit pursuant to this paragraph, the subscriber's Lifeline benefit will apply to the newly selected service until the end of the original twelve (12)-month period, and the subscriber will not be required to recertify until the end of the original twelve (12)-month period. The subscriber's original provider must provide the subscriber's eligibility records to either the subscriber's new provider or the subscriber to comply with the twelve (12)-month service period.

(N)

(N)

10. The Company will process all applications and apply the appropriate credit on the customer's monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline assistance.

(T,M)

11. As a participant in Lifeline Assistance, customers are eligible to receive Toll Limitation Service at no charge for any Lifeline voice telephone service that charges a fee for toll calls, either domestic or international, that is in addition to the monthly price of the customer's Lifeline service. This service will only be provided at the customer's request and is limited to plans that distinguish between local and long-distance calling.

(T)

(T)

12. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.

(T)

13. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.

(T)

14. Partial payments that are received from Lifeline voice telephone customers will first be applied to local service charges and then to any outstanding toll charges.

(T)

(M)

(D)

(D)

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.

Union Springs Telephone Company

Section 2  
6<sup>th</sup> Revised Sheet 11

## S2. BASIC LOCAL EXCHANGE SERVICE

### S2.13 LIFELINE ASSISTANCE PROGRAM (Continued)

#### B. Regulations (Continued)

15. Lifeline subscribers may apply their Lifeline discount to voice telephone service, broadband Internet access service, or a bundle of broadband Internet access service and voice telephone service; and plans that include optional calling features, such as, but not limited to, caller ID, call waiting, voicemail, and three-way calling. The Lifeline discount may also be applied to family shared data plans. The calling plan must be in the name of the eligible subscriber, and a household may receive only one Lifeline supported service. Partial payments from Lifeline subscribers purchasing bundled packages or packages containing optional calling features will first be applied to pay down the allocated price of the Lifeline supported services. (T,C,N)
16. The PICC will not be billed to Lifeline customers who subscribe to toll blocking and do not pre-subscribe to a long distance carrier. (T,M)  
(M)

#### C. Credits

The following monthly credit will apply for each customer eligible for Lifeline Assistance:

	Monthly Credit
a) Federal Credit	\$ 9.25

The maximum Lifeline Assistance credit available to Alabama customers is \$9.25 per month. The credit amount will not exceed the basic charge for local service, which includes the Subscriber Line Charge, access line and local usage.

### S2.14 CLASSROOM COMMUNICATION SERVICE

#### A. General

1. Classroom Communication Service provides local access service for in-classroom voice and data communications. It is intended only as a communications link between classrooms for the purpose of enhancing the education process by allowing one or more teachers to conduct classes at multiple locations and to access various information databases
2. Customers may subscribe to Classroom Communication Service rates for access lines used exclusively for the following purposes:

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.

GENERAL SUBSCRIBER SERVICES TARIFF

Union Springs Telephone Company

Section 3  
2<sup>nd</sup> Revised Sheet 6

**S3. CONCURRENCE STATEMENTS**

**S3.14 INTRASTATE ACCESS**

Union Springs Telephone Company adopts the Exchange Carriers' Association Interstate Access charge tariff for intrastate use. This tariff was filed with the FCC by NECA on behalf of NECA's member companies (this Company is a member Company of NECA). This tariff includes all rules, regulations, rates and charges under which interstate access service will be offered. Exceptions to this adoption of this tariff are stated in Section 200.

**S3.15 DUAL PARTY RELAY SERVICE**

Union Springs Telephone Company concurs with the Dual Party Relay Service rates, rules and regulations filed with the Alabama Public Service Commission by Bell South Telephone Company, together with any amendments or successive issues thereof, and makes itself a party to such rates, rules and regulations.

Dual Party Relay Service permits hearing and speech impaired users of Telecommunications Devices for the Deaf (TDD) to communicate with users of ordinary telephones. Communications take place by relaying conversations (voice to TDD and TDD to voice). These calls are between one party who must communicate by means of a TDD and another who communicates by means of an ordinary telephone. Messages are rated from the rate center of the calling party to the rate center of the called party. Subscribers may access the Alabama Telephone Relay Service by dialing 7-1-1 or a designated toll-free 800 number.

(D)

|

(D)

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.:

GENERAL SUBSCRIBER SERVICES TARIFF

Union Springs Telephone Company

Section 26  
1<sup>st</sup> Revised Sheet 7

**S26. DEFINITIONS**

KEY LINE TELEPHONE SERVICE - A service that enables a circuit connecting a key system with a central office.

LEASE LINE - A channel tying together two or more points in the exchange area for the sole use of the subscriber. It is terminated at each point on the subscriber owned equipment and is not connected to the central office switching equipment.

(D)  
|  
(D)

LOCAL ACCESS AND TRANSPORT AREA (LATA) - Geographic area established for the purpose of defining the territory within which a Bell Operating Company may offer its telecommunications services.

LOCAL CHANNEL - That portion of a channel which connects a station to an interexchanging channel or a channel connecting two or more stations within an exchange area.

LOCAL MESSAGE - A completed communication between customer's stations located within the same exchange area or local service area.

LOCAL SERVICE AREA - The area within which telephone service is furnished customers under a specific schedule of exchange rates and without toll charges. A local service area may include one or more exchange areas.

MAINTENANCE OF SERVICE CHARGE - The charge for each visit by the Telephone Company to the premises of the customer, or authorized user, where the report results from the use of equipment provided by the customer, or authorized user.

MESSAGE - A completed telephone call regardless of length of call or time and distance involved.

MESSAGE RATE - Local exchange service billed on a per-message basis.

Issue Date: May 17, 2017  
Issued By: Ray Wasden  
Title: General Manager

Effective Date: June 15, 2017  
Docket No.:

**Union Springs Telephone Company (SAC 250322)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Union Springs Telephone Company (“Company”) hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

REDACTED FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**